

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO

**In re:** ) **Case No 18-41778**  
)  
**Timothy M. Ady, Sr.** ) **Chapter 13**  
)  
**Debtor(s).** ) **Judge Russ Kendig**  
)  
) **AMENDED OBJECTION TO CONFIRMATION OF**  
) **DEBTOR'S CHAPTER 13 PLAN**

Now comes Wilmington Savings Fund Society, FSB dba Christiana Trust as Owner Trustee of the Residential Credit Opportunities Trust III ("creditor"), a secured creditor, and hereby objects to the Debtor's Chapter 13 plan on the following grounds:

Objecting Creditor states that it has a secured claim against the Debtor and that the proposed Plan fails to properly list and provide for said claim. This claim is secured by real estate located at 6591 North Park Ave., Cortland, Ohio 44410.

The Plan fails to properly list and provide for the prepetition arrears in this matter. There are pre-petition arrears in the amount of \$42129.93 as listed in the Proof of Claim filed or to be filed by creditor which are not properly listed in said Plan. Creditor is holder of a first mortgage on said property and is not being treated properly.

The Chapter 13 Trustee should pay conduit payments due to the large amount of arrearages owed to creditor.

WHEREFORE, Wilmington Savings Fund Society, FSB dba Christiana Trust as Owner Trustee of the Residential Credit Opportunities Trust III prays this Court deny confirmation of the proposed Chapter 13 Plan.

RESPECTFULLY SUBMITTED,  
SANDHU LAW GROUP, LLC

/s/ David T. Brady  
David T. Brady (0073127)  
Suzanne M. Godenswager (0086422)  
Andrew M. Tomko (0090077)  
Austin B. Barnes III (0052130)  
Sandhu Law Group, LLC  
1213 Prospect Avenue, Suite 300  
Cleveland, OH 44115  
216-373-1001, Fax 216-373-1002  
dbrady@sandhu-law.com

*Attorney for Wilmington Savings Fund Society, FSB dba  
Christiana Trust as Owner Trustee of the Residential Credit  
Opportunities Trust III*

CERTIFICATE OF SERVICE

The undersigned certifies that on January 30, 2019, a true and correct copy of the foregoing Amended Objection to Confirmation was served:

Andrew W. Suhar  
asuhar@suharlaw.com  
***Attorney for Debtor***

Michael A. Gallo.  
mgallo@gallotrustee.com  
***Trustee***

and by regular U.S. mail, postage prepaid, to:

Timothy M. Ady, Sr.  
6591 North Park Avenue  
Cortland, OH 44410  
***Debtor***

/s/ David T. Brady  
David T. Brady (0073127)  
Suzanne M. Godenswager (0086422)  
Andrew M. Tomko (0090077)  
Austin B. Barnes III (0052130)  
Sandhu Law Group, LLC